

# raiser&kenniff

## ATTORNEYS AT LAW

Steven M. Raiser  
Thomas A. Kenniff  
Douglas M. Reda

300 Old Country Rd, Suite 351  
Mineola, NY 11501  
Tel. 516-742-7600 • Fax 516-742-7618

Of Counsel  
Anthony J. Colletuori  
Marc S. Albert

May 4th, 2023

**VIA EMAIL/ECF**

Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: *United States v. Elena Moldovan* (1:20-cr-00467-SHS)

Dear Judge Stein:

Our office represents Elena Moldovan, the defendant in the above-captioned matter. We respectfully request that the attached sentencing submission be filed under seal. A courtesy copy was provided via email to AUSA Lynaugh and chambers on May 3rd, 2023.

The submission contains sensitive/confidential information that should not be accessible to the public. If after review, the Court believes the attached submission should be filed via ECF then the undersigned will do so.

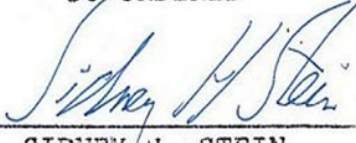
**The request to file the sentencing submission under seal is granted.**

**Dated: New York, New York  
May 5, 2023**

Respectfully,

*Thomas A. Kenniff*

Thomas A. Kenniff

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.

/kb

cc: AUSA Margaret Lynaugh (Via

Manhattan Office  
87 Walker Street  
New York, NY 10013  
212-274-0090

[www.raiserandkenniff.com](http://www.raiserandkenniff.com)

Suffolk Office  
150 Motor Parkway, Suite 401  
Hauppauge, NY 11788  
888-504-2746